

United States District Court  
for the District of Puerto Rico

Rm

The Financial Oversight And  
Management Board for Puerto Rico

promesa

Title III

Rm 178966

178975

as representative of

NO. 17 BK 3283-LTS

The Commonwealth of  
Puerto Rico

jointly administered

This filing relates to  
The Commonwealth (PBA)

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objection to the three hundredth omnibus  
objection (non-substantive) of the Commonwealth  
of Puerto Rico, the employees retirement system of  
the government of the Commonwealth of Puerto Rico,  
and the Puerto Rico Highways and Transportation  
Authority to duplicate claims, Doc # 16020

objection to the three hundred seventy fourth  
omnibus objection (substantive) of the Commonwealth  
of Puerto Rico, Puerto Rico sales tax financing  
Authority, Puerto Rico Highways and Transportation  
Authority, employees retirement system of the  
government of the Commonwealth of Puerto Rico,  
and Puerto Rico public buildings Authority to late  
filed claims, Doc # 17923

The Debtors in these Title III Cases, along with



each Debtor's respective Title III Case Number and the last four (4) digits of each Debtor's Federal Tax Identification Number, as applicable, are the (i) Commonwealth of Puerto Rico (The Commonwealth) (Bankruptcy Case No. 17-BK-3283-LTS) (last four digits of Federal Tax id: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Cotina) (Bankruptcy Case No. 17-BK-3284-LTS) (last four digits of Federal Tax id: 8474); (iii) Puerto Rico Highways and Transportation Authority (HTA) (Bankruptcy Case No. 17-BK-3567-LTS) (last four digits of Federal Tax id: 3808); (iv) employees retirement system of the government of the Commonwealth of Puerto Rico (ERS) (Bankruptcy Case No. 17-BK-3564-LTS) (last four digits of Federal Tax id: 9686); (v) Puerto Rico electric power Authority (PREPA) (Bankruptcy Case No. 17-BK-4780-LTS) (last four digits of Federal Tax id: 3747); and (vi) Puerto Rico Public Buildings Authority (PBA) (Bankruptcy Case No. 19-BK-5523-LTS) (last four digits of Federal Tax id: 3801) (Title III Case Numbers are listed as Bankruptcy Case Numbers due to software limitations.)



To The Honorable United States District Court Judge  
Laura Taylor Swain:

The Commonwealth of Puerto Rico (The Commonwealth),  
The employees retirement system of the government  
of the Commonwealth of Puerto Rico (ERS), and the  
Puerto Rico Highways and Transportation Authority  
(HTA) and together with the Commonwealth  
and ERS, the debtors) by and through the  
financial oversight and management Board  
for Puerto Rico (the oversight Board) as the  
debtors sole Title III representative pursuant  
to section 315(b) of the Puerto Rico oversight,  
management, and economic stability Act  
(Promesa), submitted the three hundredth  
omnibus objection (the "three hundredth omnibus  
objection") to the duplicative proofs of  
claims listed on exhibit A under Doc#16020

The Commonwealth of Puerto Rico (The Commonwealth)  
The Puerto Rico Sales Tax Financing Authority  
(Cotina), the Puerto Rico Highways and  
Transportation Authority (HTA), the employees  
retirement system of the government of the  
Commonwealth of Puerto Rico (ERS) and the  
Puerto Rico Public Buildings Authority (PBA) and  
together with the Commonwealth, Cotina, HTA,  
ERS, the debtors) by and through the financial



oversight and Management board for Puerto Rico (the oversight board) as sole Title III representative pursuant to Section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act (promesa) submitted the three hundred seventy-fourth omnibus objection (the three hundred seventy fourth omnibus objection to the proof of claims listed on exhibit A under Doc # 17923 for failure to comply with the terms of the bar orders.

and in support of the objection to the three hundredth omnibus objection (non-substantive) of the Commonwealth of Puerto Rico and others under Doc # 16020, and in support of the objection to the three hundred seventy fourth omnibus objection (substantive) of the Commonwealth of Puerto Rico and others under Doc # 17923, and in support of the objection of the order granting the three hundredth omnibus objection (non-substantive) of the Commonwealth of Puerto Rico and others under Doc # 16824, Mr. Jaime A. Diaz Ortiz respectfully represent as follows:



## Jurisdiction

1. The United States District Court for the District of Puerto Rico has Subject Matter jurisdiction to consider this matter and the relief requested herein pursuant to promesa Section 306(a)
2. Venue is proper in this district pursuant to promesa Section 307(a)

## Background

### A. The Bar Date orders

1. On May 3, 2017 the Oversight Board issued a restructuring Certification pursuant to promesa Sections 104(j) and 206 and filed a voluntary petition for relief for the Commonwealth of Puerto Rico (the Commonwealth) pursuant to promesa Section 304(a) commencing a case under Title III thereof of (the Commonwealth Title III Case)
2. On May 21, 2017 (the petition date) the Oversight Board issued restructuring Certifications pursuant to promesa Sections 104(j) and 206 and filed voluntary petitions for relief



for HIA and (ers), pursuant to promissa Section 304(a) Commencing a Case under Title III thereof (The ERS Title III Case and The HIA Title III Case respectively and together with The Commonwealth Title III Case, The Title III Cases). On June 29, 2017 The Court entered an order granting the joint administration of the Title III Cases for procedural purposes only. ecf no. 537.

3. On January 16, 2018 The debtors filed Their Motion for order (A) establishing dead lines and procedures for filing proofs of claims and (B) Approving form and Manner of Notice thereof (ecf no. 2255) (The bar date Motion) By The order (A) establishing dead lines and procedures for filing proof of claims and (B) Approving form and Manner of Notice thereof (ecf 2521) (The initial Bar date order) The Court granted The Relief requested in The Bar date Motion and established dead lines and procedures for filing proofs of claims in The Title III Cases. upon The informative Motion of certain creditors, and The Support of The debtors The Court subsequently entered The order (A) extending dead lines for filing proofs of claims and (B) Approving form and Manner of Notice thereof (ecf no. 3160) Together with



The initial Bar date order, the Bar date orders) extending these deadlines to June 29, 2018 at 4:00 PM (Atlantic Time).

4. Since May 3, 2017 pursuant promesa Sections 104(i) and 204, pursuant section 304(a) of promesa, a case under Title III thereof the Commonwealth Title III case all the cases against the Commonwealth of Puerto Rico are in a stay of the procedures.

5. as a result of Hurricane Maria the federal agency for emergency Management (fema) under disaster number 4339, Registration id 50-3434886 Housing assistance, the federal agency (fema) offered me a housing voucher, thus traveling on December 11, 2017 to Fort Lauderdale, Florida and staying in the extended stay America, 1450 SE 17th St. Fort Lauderdale, FL 33316 from December 12, 2017 to February 15, 2018 check out date.

6. i got a temporary job with the City of Oakland Park, after check out of the hotel Homeless but working i slept inside my personal vehicle.



7. The temporary work with the City of Oakland Park ended and I decided to start going up 95 North to New York City, and so I did. I went up the entire east coast of Florida and enter Georgia.
8. Since my trip to Florida on December, 11 2017 to I decide to start going up 95 North to New York City, Mrs. Aida delgado Colon and Mr. William Young Federal Judges one for District Court of Puerto Rico, the other visiting judge from Boston, MA District Court, the same building of the first Circuit Court of Appeals for Puerto Rico, they had requested from me, the translation of the lawsuits because with the circumstances of the Hurricane Maria among others I was forced to submit the lawsuits in Spanish and they requested the translation to English,
9. And that request I attended while in Florida and within the terms to submit the proof of claim, (ecf No. 3140) together with the initial Bar date order, the Commonwealth of Florida, HIA, and ERS Bar date orders extending these deadlines to June 29, 2018 at 4:00 PM Atlantic Time.



10. My road trip to New York City is within the terms dictated by the Honorable Laura Taylor Sworn and under a stay of the procedures, ecf Num. 3160) pursuant promesa Sections 104(j) and 206, pursuant to promesa Section 304(a) under Title III thereof (The Commonwealth Title III Case) May 3, 2017 and without anyone having requested a stay lift.
11. on the Highway to New York and in the pooler, Georgia area as of 16 of June of 2018 I take a Highway exit to get gas, at gas station across from Walmart, Pooler Georgia.
12. After putting gasoline I proceed to check the water and oil of the vehicle while in that process a group of police arrived and they arrested me in a false arrest.
13. They took my vehicle in a tow truck that arrived five minutes after they had arrived, a coordinated arrest with a private tow truck, See exhibit A (11, 12, 13, 14, 16)
14. That the next day I was released in the morning with a charge fabricated, a false arrest that the only concerted purpose was damage due process of law, damage



and affect the timely appearance (ect. 3160)  
The initial Bar date order, the deadlines to  
June 29, 2018, in this way the timely  
appearance was damaged, collateral with  
which the arguments in favor of the lawyers  
were established to request dismissal  
for any subsequent grounds as has occurred.  
See exhibit A (1, 3, 11, 12, 13, 14, 16) See (ect. 3160)  
See Doc# 16020, Doc# 16824, Doc# 17923.

15. This false arrest was not a fluke this  
was a concerted criminal action in favor  
of the defendants and his lawyers and  
in favor of the oversight board as sole  
title III representative, this concerted  
action came with a set-up of persecution  
and intelligence on me from the state  
of Florida, being in Fort Lauderdale, after  
check out of the hotel, on the road, at  
all my stops to New York City.
16. They waited for me to leave the state of  
Florida and the false arrest was definitely  
going to happen any time on the road, they  
observed that I had to stop for gasoline  
and they definitely took advantage of the  
occasion in poster Georgia. See exhibit A  
(1, 3, 11, 12, 13, 14, 16, see. (ect. 3160)



See Doc # 16020, Doc # 16824, Doc # 17923

17. In the Morning of June 17, 2018 I had the clothes that I was wearing and a dollar fifty cents that was given to me for the bus in Chatham County Jail, without knowing where they had taken my vehicle, no money, no food, when I was able to get to 95 North I had to sleep for days where the night would catch me because my vehicle has a money debt with the towing truck.

18. That collaterally with the false arrest order, Mrs. Aida delgado Colon, affected Mrs. Frances Ros de Moran, issue false summons and without any authority even without seal of the Secretary see exhibit A (6, 7, 8, 9, 10), they actively participated in this false arrest with personal interest about my demands, and lawsuits, see exhibit A (1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 18, 19, 20, 21) See ex. 3160 Doc # 16020 Doc # 16824 Doc # 17923

19. it took me a month to resolve the damage of the false arrest on June 16, 2018 and be able to borrow money to take out my vehicle the tow truck impound had damage the



allignment of the Car, stole my legal documents, and the only Money I had in my belongings See exhibit A (1, 6, 7, 8, 9, 10, 11, 12, 13, 14, 16, 18).

20. arrived to New York City on 31 of July of 2018 See exhibit A (19) to the public advocate office Mrs. Leticia James to Submit Complaint and request See exhibit A (19, 20).

21. The damage had already been Consummated in accordance with (ecf 3160) the initial Bar order and these would be the reasons to issue Summons authorized by Aide delgado Colon on 30 of July of 2018 one day before I arrive to New York City See exhibit A (18, 19, 20) The same actions of the false arrest of Pooler, GA, a week before the fake arrest they issue fake and unsigned Summons 11 of June of 2018 See exhibit A (1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 16, 18, 19, 20)

22. as a consequence of the illegal Summons issued and filled out by alleged Marshalls of the Court all the same day illegal terms began to answer the same, Accordingly the justice department appeared alone again Mr. James a Day Overl was in the jail See exhibit A (21)



23. These acts are not a coincidence, this is called organized crime, deprivation of due process of law, prepared dismissal arguments to lawyers of the Oversight Board in fact pro Kauer LLP submitted them in total absence of due process and law and corruption.
24. in this way depriving a person who is representing himself in his own right in the form of poor with false arrest is organized crime. and clearly it is not consistent with the procedural orders, the standing orders, (ecf 3160) the 17 BK 3283-LTS. See exhibit A (1 to 45)
25. in relation exhibit A (6, 7, 8, 9, 10, 11, 12, 13, 14, 16, 18, 19, 20, 21 Mr. Gustavo Gelpi Jr. invite to participate to Mr. Raul M. Arias Markvacht, Mr. Arias Markvacht recused himself See exhibit A (22, 2)
26. Mr. William G. Young also participated in the same scheme promoted an illegal process collateral when illegally dismissed the case, Mr. James A. Dixon Overly was in the fall in a state of defenselessness (see exhibit A 1 to 45, see ecf-3160, see exhibit A (23).



27. According to doc # 17923 I Had until September 20, 21 To respond, I was present at the 30th public Board Meeting in date of 17 of September of 2021, the Meeting will take place at the Puerto Rico Convention Center Room 209 beginning at 9:00 AM AST, I was there for the entire audience See exhibit A 27.

28. See exhibit A (26, 27, 28, 29,) See exhibit A (33, 34).

29. Again, this time on 18 of September of 2021 and within the terms of 20 of September of 2021 to respond I am arrested in a false arrest depriving me of appearance to my Case, Corruption, organized crime, depriving me of my constitutional rights and due process of law. See exhibit A 33, 34, 35, 36, 37, 38, 39)

30. They released me after the term expired to answer, To respond Doc # 17923 See exhibit 38.

31. See exhibit 35, 36, 37, 38, 39 with specificity. See exhibit A 1 to 45 See oct-3160 June 29, 2018.



32. The late filing of the proof of claim on 17 of December of 2020 is irrelevant because the Oversight board already from the week before the deadline 29 of June of 2018 ~~ecf-3160~~ had achieved its purpose through organized crime false arrest and Corruption See exhibit A (4 to 45)

33. Not even when the proof of claim was filed late, prime clerk never notified me of anything from 17 of December of 2020, so far the only thing I have received from prime clerk has been the exhibit A (43, 44, 45) by forwarding late on 2 of November of 2021 after submitting to the Court (19006)(19063)(19178)(19125)(19142)(19255)(19254)(19343) under Doc # 19359 See exhibit A 40, 41, 42, 43, 44, 45,)

34. Under Doc # 16020 praskauer lawyers exposes if the claims to be rejected they are not rejected, it would result in which the corresponding claimants obtained potentially a duplicate recovery not justified against debtors to the detriment of others parties interested in the Title III cases.



35. Under doc # 16020 the Holders of the claims that have to be rejected will not be harmed by the fact that claims are rejected for the reason each of said Holders will maintain a claim against debtors - See Exhibit A (1 to 45) See ecf-3160
36. prime clerk Never notified me Doc # 16020 Doc # 16024 Doc # 17923 I knew of these documents with posteriority to the false arrest of 18 of September of 2021 depriving me of appearing to response on 20 of September of 2021 under # doc 17923
37. The claim bases are established prior to the filing of the Case of Title III promesa on 3 of May 2017 17-BK-3283-LTS of which I was deprived to participate under organized crime and Corruption.
38. I have objection to the Jay Herriman statement in all its parts, See exhibit (1 to 45) See ecf-3160, under Doc # 16020, under Doc # 16024, under Doc # 17923



B. proof of claims, omnibus objection procedures, and claim objections.

39. The proof of claim had a deadline which was June 29, 2018 (ecf-3160) of there having been no organized crime maybe already I would have returned to work in the Puerto Rico Aqueduct and Sewer Authority.

40. The fake arrest in pooler, GA dismissed both of my claims, let's see, under Doc # 16020 proskauer llc through their lawyers Martin J. Bordenstock, Brian S. Rosen exposed duplicative of liabilities asserted on remaining claim, liabilities asserted on claim to be disallowed exhibit A Doc # 16020, Never use late proof of claim as a basis for dismissal under Doc # 16020 with specificity, they used duplicative of liabilities on remaining claim, any failure to disallow the claims to be disallowed will result in the applicable claimants potentially receiving an unwarranted double recovery against the debtors to the detriment of others stakeholders in the Title III Cases See ecf-3160.



41. Has there been duplicity, there was no remaining claim because the false arrest under organized criminal pooler, GA previous a deadline on 29 of June of 2018 had already dismissed my two claims in one fell swoop depriving me of appearing opportunistically to the due process of law, to the equal protection of the laws, abusing a person in a state of indigent, in a state of helplessness, depriving him of the right to work, because there is a group of unfortunates paying money behind the wall for carrying out these acts of organized crime.
42. For the purposes of my cases the date of June 29, 2018 was everything and I was deprived, was deprived of my constitutional rights in all its parts, I was deprived of all procedural orders, of the standing orders, to present evidence as part of due process of law
43. The arrest of September 18, 2021, not only kidnapped within a year every possibility of appearance and defense, but it was the last possibility of appearing within any valid term of the Court orders under 178975 claim number, under Doc # 17923, Date to Respond Deadline 20 of September of 2021



44. Collateral with the arrest 18 of September of 2021, on 20 of September of 2021 the deadline for purpose of Doc # 17923 the department of Justice of Puerto Rico "The Defendants" they sent me a letter through Mrs. Miralga Diaz Rodriguez in relation to the case handled by Aida delgado colon, when this happened I am in the jail, moving a case procedurally that is in a stay of the procedures from 3 of May of 2017 under section 104(j) 206 promesa. See exhibit A(36). See ecf-3160

45. What else happened while was in jail a sentence was issued by a judge that I do not recognize, I do not recognize this person to be assigned to the case never, a sentence is issued on 21 of September of 2021 this is coincidentally the collateral of the case District Court of Aida delgado colon, the collateral of the kidnapping in Pooler, GA on 16 of June of 2018 See ecf-3160, the most incredible thing is that this happens under a stay of the procedures from 3 of May of 2017. See exhibit A-37, See ecf-3160, See Pooler, GA, See exhibit A-38, See exhibit A-27, 26, 28, 29.



46. When we talk about proof of claim, omnibus objection procedures, and claim objection, when we talk about objections to proof of claim it is necessary that primeclerk has made a timely notification of any document related to the case where the plaintiff is equally affected even if your proof of claim has been late, late for justifiable or unwarranted reason, these notifications are essential for the defense of a case and if even when a late filing it is not processed properly as in the case at hand, by primeclerk we have great damages among others to the due process of law and administrative handling of files and notification. Myself never received from primeclerk notification of Doc # 16080, Doc # 16804, Doc # 17923 as a part of a process under the declaration of Jay Herriman.

47. Under declaration of Jay Herriman it is said that is a Managing Director of Alvarez and Marsal North America LLC, the financial oversight and Management Board "the Oversight Board" retained Alvarez and Marsal to assist with investigating the claims reconciliation process of debtors cases filed pursuant to the Puerto Rico Oversight Management and Economic Stability Act "promesa" unless otherwise stated in this declaration, I have personally



Knowledge of the facts set forth herein  
Hereby declare under penalty of perjury that  
following is true and correct to the best  
of his knowledge, and I Oelmer Diaz Orell  
I have objections to this declaration under perjury  
in the doc # 16020, doc # 17923 doc # 16824  
related.

40. I never received any communication from  
primed clerk regarding the process of  
reconciliation and objections regarding claims,  
# doc 16020, # doc 17923, # doc 16824 in the  
alternative if for any valid reason there is  
duplication, you cannot dismiss the remaining  
case against the Puerto Rico Aqueduct and  
Sewer Authority.

50. Again if for any valid reason there is  
duplication you cannot dismiss the remaining  
case against the Puerto Rico Aqueduct and  
Sewer Authority, the Puerto Rico Aqueduct  
and Sewer Authority Complete Restructuring,  
the deficiencies if some are justified in  
law, with solid documentary and factual  
evidence, See exhibit A-(1-45)



51. The Puerto Rico Aqueduct and Sewer Authority of Puerto Rico has a Sentence and Mandate of Re-establishment to my job position within the Public Corporation, are there on this issue due to denial of due process of law under organized crime, this has been a concerted action of Mr. Donald J. Trump defendant, the United States Department of Justice, Rosa E. Rodriguez, Department of Justice of Puerto Rico, Wanda Vazquez forced, Court Administration Sigfrido Steidel, Police of Puerto Rico, Michelle Frele et. al., the defendants in general, his lawyers in favor of the procedurally fabricated argumentation as a basis for requesting dismissal of a case, judges assigned with interest.

52. it Submitted under exhibit B Sentence and Mandate to the Reinstatement from Court of appeals, San Juan PR, Decision and order of the Puerto Rico Labor Relation Board to reinstate to my labor position in (prasa) Puerto Rico Aqueduct and Sewer Authority attach all inherent rights. See exhibit B (1 to 44)

53. it Submitted under exhibit C Gortlenio Figueroa Prieto lawyer Notary 29 of November of 2005, it Submitted Marcel Díaz Jimenez



pooler, GA / #15447054 Georgia Power Doc #16022  
See EXHIBIT C (1-2) Aida delgado Colon

54. Me would have no objection to dismissal for duplication under the claim #178966 but I have objection to the request to dismiss under any argument the claim #178975 related to reinstate my person to my job in the Puerto Rico Aqueduct and Sewer Authority claim #178975

### Notification

55. In accordance with the procedures relating to global objections and the notification order under Doc #16022 Doc #17923 a copy of the notice for the objection omnibus under Doc #16022 Doc #17923 is attached hereto as exhibit D



order

Wherefore the plaintiff respectfully request entry of an order in the form of the proposed order attach hereto exhibiting: 1) granting the relief request herein and 2) granting the plaintiff such other further relief as is just.

Respectfully Submitted

13 of December of 2021

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